

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION  
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GUSTAVO MENDOZA AND HADA MENDOZA,

07CV4494

Plaintiffs,

ANSWER TO  
AMENDED  
COMPLAINT

- against

55 WATER STREET CONDOMINIUM, 59  
MAIDEN LANE ASSOCIATES, LLC, 60  
HUDSON OWNER LLC, 90 CHURCH STREET  
LIMITED PARTNERSHIP, AJ GOLDSTEIN &  
CO., ALAN KASMAN DBA KASCO, ALAN L.  
MERRIL, AMBIENT GROUP, INC., AMG  
REALTY PARTNERS, LP, ANN TAYLOR  
STORES CORPORATION, BANKERS TRUST  
COMPANY, BATTERY PARK CITY  
AUTHORITY, BELFOR USA GROUP, INC.,  
BETTY JEAN (GRANQUIST, BFP ONE LIBERTY  
PLAZA CO., LLC, BLACKMON-MOORING  
STEAMATIC CATASTROPHE, INC. D/B/A BMS  
CAT, BOSTON PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., BT PRIVATE  
CLIENTS CORP., CAROL GAYNOR TRUST,  
CAROL GAYNOR, AS TRUSTEE OF THE  
CAROL GAYNOR TRUST, CAROL MERRIL  
GAYNOR, DEUTSCHE BANK TRUST  
COMPANY, DEUTSCHE BANK TRUST  
COMPANY AMERICAS, DEUTSCHE BANK  
TRUST CORPORATION, ENVIROTECH CLEAN  
AIR, INC., FRED GOLDSTEIN, GENERAL RE  
SERVICES CORP., GPS ENVIRONMENTAL  
CONSULTANTS, INC., HARLAN GAYNOR,  
AS TRUSTEE UNDER A DECLARATION OF  
TRUST, HAROLD G. GOLDSTEIN, AS

TRUSTEE UNDER A DECLARATION OF TRUST, HERMAN L. BLUM, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, FIILLMAN ENVIRONMENTAL GROUP, LLC. IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., JONES LANG LASALLE AMERICAS, INC., JONES LANG LASALLE SERVICES, INC., KASCO RESTORATION SERVICES CO., MARGARET G. WATERS, MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY, MERRILL LYNCH & CO, INC., NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST, NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW WATER STREET CORP., NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NEW YORK UNIVERSITY, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, PAMELA BETH KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, ROWAN K, KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, RUTH G. LEBOW, SHIRLEY G. SHOCKLEY, AS TRUSTEE UNDER DECLARATION OF TRUST, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., SYLVIA R. GOLDSTEIN, THAMES REALTY CO, THE BANK OF NEW YORK TRUST COMPANY NA, THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TOSCORP INC., TUCKER ANTHONY, INC., TULLY CONSTRUCTION CO., INC., TULLY

INDUSTRIES, [NC, VERIZON NEW YORK,  
INC, WESTON SOLUTIONS, INC., WFP ONE  
LIBERTY PLAZA CO., L.P., WFP ONE  
LIBERTY PLAZA, CO. GP, CORP., WFP  
TOWER A CO., WFP TOWER A CO. G.P.  
CORP., WFP TOWER A. CO., L.P., WFP TOWER  
B CO. G.P. CORP., WFP TOWER B HOLDING  
CO., LP, WFP TOWER B. CO., L.P., AND  
WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as  
and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off  
Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts  
Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the  
matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102  
(AKH).

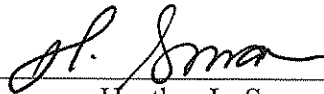
WHEREFORE, the defendant Envirotech demands judgment dismissing the above-  
captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
April 1, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT  
Attorneys for Defendant –Envirotech  
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BY: \_\_\_\_\_



Heather L. Smar (4622)